

**Exhibit B**

February 2002 Fee Application

## UNITED STATES BANKRUPTCY COURT

## FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
	)	
W.R. GRACE & CO., <i>et al</i>	)	Case No. 01-01139 (JJF)
	)	(Jointly Administered)
	)	
Debtors.	)	

**SUMMARY COVERSHEET TO ELEVENTH MONTHLY INTERIM APPLICATION  
OF WALLACE KING MARRARO & BRANSON PLLC  
FOR COMPENSATION AND FOR REIMBURSEMENT OF EXPENSES FOR  
FEBRUARY 1, 2002 THROUGH FEBRUARY 28, 2002**

Name of Applicant:	Wallace King Marraro & Branson PLLC. ("WKMB")
Authorized to provide professional services to:	Special Litigation and Environmental Counsel to Debtors
Date of Retention:	April 2, 2001
Period for which compensation and reimbursement is sought:	February 1, 2002 through February 28, 2002.
Amount of compensation sought as actual, reasonable and necessary	\$67,957.20 for the period February 1, 2002 through February 28, 2002 (80% of \$84,946.50 after 40% discount for Honeywell matter), in professional fees).
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$3,160.68 for the period February 1, 2002 through February 28, 2002.

This is a:      Monthly interim application.

Prior Applications filed: Yes.

Date Filed	Period Covered	Requested Fees	Requested Expenses	Status of Fees	Status of Expenses
7/5/01	4/2/01 through 4/30/01	\$216,471.50	\$25,282.16	80% Paid	100% Paid
7/5/01	5/1/01 through 5/31/01	\$244,726.00	\$26,594.89	80% Paid	100% Paid
8/9/01	6/1/01 through 6/20/01	\$186,977.91	\$90,104.66	80% Paid	100% Paid
8/28/01	7/1/01 through 7/31/01	\$101,544.08	\$52,387.36	80% Paid	100% Paid
10/18/01	8/1/01 through 8/31/01	\$85,722.80	\$56,387.04	80% Paid	100% Paid
11/05/01	9/1/01 through 9/30/01	\$66,562.16	\$24,668.50	80% Paid	100% Paid
12/13/01	10/1/01 through 10/31/01	\$76,674.32	\$10,019.94	80% Paid	100% Paid
1/02/02	11/1/01 through 11/30/01	\$76,484.30	\$13,513.96	80% Paid	100% Paid
2/12/02	12/1/01 through 12/31/01	\$46,954.80	\$17,209.63	No objections served on Counsel	No objections served on Counsel
2/21/02	1/1/02 through 1/31/02	\$79,379.36	\$2,260.41	No objections served on Counsel	No objections served on counsel

As indicated above, this is the eleventh application for interim compensation of services filed with the Bankruptcy Court in the Chapter 11 Cases

Summary of Compensation Requested

Name of Professional Individual	Position, year assumed, prior relevant experience, year of obtaining relevant license to practice	Hourly Billing Rate (including Charges)	Total Hours Billed	Total Compensation
Christopher Marraro	Partner	\$440	67.0	\$29,480.00
Angela Pelletier	Associate	\$225	12.8	\$2,880.00
William Hughes	Counsel	\$350	150.0	\$52,500.00
Tamara Parker	Associate	\$270	75.5	\$20,385.00
Tonya Manago	Paralegal	\$135	1.5	\$202.50
Barbara Banks	Paralegal	\$135	139.8	\$18,873.00
Natasha Bynum	Legal Clerk	\$100	30.0	\$3,000.00
Mahmoude Moasser	Paralegal	\$135	52.0	\$7,020.00
Reilley L. Smith	Paralegal	\$120	12.3	\$1,476.00
Keith Kaider	Paralegal	\$135	3.0	\$405.00

Total Fees \$136,221.50

Total Hours 543.90

**EXPENSE SUMMARY**

Expense Category	Amount Requested
Copies- Internal and Outside	\$1,331.50
Facsimile	\$17.25
Lexis	\$574.35
Telephone	\$66.73
Westlaw	\$874.90
Overtime Transportation	\$251.08
FedEx	\$20.00
Postage	\$24.87
<b>Total</b>	<b>\$3,160.68</b>

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JJP)  
) (Jointly Administered)  
)  
Debtors. )

**VERIFIED APPLICATION OF WALLACE KING MARRARO & BRANSON FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES  
AS SPECIAL COUNSEL TO W. R. GRACE & CO., ET AL., FOR  
THE ELEVENTH INTERIM PERIOD FROM FEBRUARY 1, 2002 THROUGH  
FEBRUARY 28, 2002**

Pursuant to sections 327, 330 and 331 of title 11 of the United States Code (as amended, the “Bankruptcy Code”), Fed. R. Bankr. P. 2016, the Retention Order (as defined below), the Administrative Order Under 11 U.S.C. §§ 105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Professionals and Official Committee Members (the “Interim Compensation Order”) and Del.Bankr.LR 2016-2, the law firm of Wallace King Marraro & Branson PLLC (“WKMB”) as special litigation and environmental counsel for the above-captioned debtors and debtors in possession (collectively, “Debtors”) in connection with their chapter 11 cases, hereby

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food ‘N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

applies for an order allowing it (i) compensation in the amount of \$136,221.50 for the reasonable and necessary legal services WKMB has rendered to the Debtors and (ii) reimbursement for the actual and necessary expenses that WKMB incurred in the amount of \$3,160.68 (the “Application”), in each case for the period from February 1, 2002 through February 28, 2002 (the “Fee Period”). In support of this Application, WKMB respectfully states as follows:

**Retention of WKMB**

1. On April 2, 2001 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”). On April 2, 2001, the Court entered an order procedurally consolidating the Chapter 11 Cases for administrative purposes only. Since the Petition Date, the Debtors have continued to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On April 12, 2001, the office of the United States Trustee appointed (i) a committee of unsecured creditors in the Chapter 11 Cases (the “Creditors’ Committee”), (ii) a committee of asbestos personal injury claimants (the “Asbestos Personal Injury Committee”) and (iii) a committee of asbestos property damage claimants (the “Asbestos Property Damage Committee.”). On June 18, 2001, the office of the United States Trustee appointed a committee of equity security holders (the “Equity Security Holders’ Committee,” collectively with the Creditors’ Committee, the Asbestos Personal Injury Committee and the Asbestos Property Damage Committee, the “Committees”).

2. By this Court’s order dated June 21, 2001, the Debtors were authorized to retain WKMB as their special counsel, effective as of the Petition Date, with regard to environmental and litigation matters (the “Retention Order”). The Retention Order authorizes the Debtors to

compensate WKMB at hourly rates charged by WKMB for services of this type and to be reimbursed for actual and necessary out-of-pocket expenses that it incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.

3. The Retention Order also allowed for a special fee arrangement with the Debtors in connection with a pending litigation matter, *Interfaith Community Organization v. Honeywell International, Inc. et al* ('Honeywell litigation'). By Agreement with the Debtors, WKMB was entitled to receive its full standard hourly rates until June 21, 2001 when its standard hourly rates billed for the Honeywell litigation was reduced by 40% in return for an interest in the outcome of the Honeywell litigation. Thus, a 40% discount is applied to all professional fees billed to the Honeywell matter (Matter 6) after June 21, 2001.

4. As disclosed in the following affidavit:

Affidavit of Christopher H. Marraro in Support of Application for Order Under 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) Authorizing the Employment and Retention of Wallace King Marraro & Branson as Special Litigation and Environmental Counsel for the Debtors and Debtors in Possession (the "Original Affidavit"), filed June 4, 2001;

WKMB does not represent any interest adverse to the estates.

5. WKMB does not currently represent, but could in the future represent parties-in-interest in connection with matters unrelated to the Debtors and the Chapter 11 Cases. WKMB will update the Affidavits when WKMB becomes aware of material new information.

6. WKMB performed the services for which it is seeking compensation on behalf of the Debtors and their estates, and not on behalf of any committee, creditor or other person.



7. Pursuant to Fed. R. Bank. P. 2016(b), WKMB has not shared, nor has agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel and associates of WKMB, or (b) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

8. This is the eleventh application for interim compensation for services rendered that WKMB has filed with the Bankruptcy Court in connection with the Chapter 11 Cases.

**Reasonable and Necessary Services Rendered by WKMB-- Generally**

9. The WKMB attorneys who rendered professional services during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years in that position	Department	Hourly billing rate	Total billed hours	Total compensation
Christopher Marraro	Partner	18 Years	Litigation	\$440.00	67.0	\$29,480.00
William Hughes	Counsel	10 Years	Litigation	\$350.00	150.0	\$52,500.00
Tamara Parker	Associate	8 Years	Litigation	\$270.00	75.50	\$20,385.00
Angela Pelletier	Associate	3 Years	Litigation	\$225.00	12.80	\$2,880.00

10. The paraprofessionals of WKMB who have rendered professional services in these cases during this Fee Period are:

Name of Professional Person	Position with the applicant	Number of years in that position	Department	Hourly billing rate	Total billed hours	Total compensation
Barbara Banks	Paralegal	4 Years	Litigation	\$135.00	139.8	\$18,873.00
Natasha Bynum	Clerk	1.5 Years	Litigation	\$100.00	30.0	\$3,000.00

Name of Professional or Person	Position with the Applicant	Number of Years in that Position	Department	Hourly Billing Rate	Total billed hours	Total amount billed
Mahmoude Moasser	Paralegal	10 Years	Litigation	\$135.00	52.0	\$7,020.00
Reilley L. Smith	Paralegal	9 Months	Litigation	\$120.00	12.3	\$1,476.00
Tonya Manago	Paralegal	5 Years	Litigation	\$135.00	1.5	\$202.50
Keith Kaider	Paralegal	4 Years	Litigation	135.00	3.0	\$405.00

Grand Total for Fees:	\$136,221.50
Less 40% Discount on Honeywell Matter 6:	( 51,275.00)
Total Due	\$ 84,946.50

11. WKMB has advised and represented the Debtors in connection with certain litigation and environmental matters. These matters include the Honeywell litigation, cost recovery litigation against other private parties and representation of the Debtors before the U.S. Environmental Protection Agency in connection with the Libby, Montana asbestos remediation matter.

12. The rates described above are WKMB 's hourly rates for services of this type. Attached as Exhibit A is a detailed itemization and description of the services that WKMB rendered during this Fee Period. Based on these rates and the services performed by each individual, the reasonable value of such services is \$136,221.50. The WKMB attorneys and paraprofessionals expended a total of 543.9 hours for these cases during this Fee Period. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount of fees requested is fair and reasonable given: (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code.

13. Further, Exhibit A (a) identifies the individuals that rendered services in each Subject Matter, as defined and described below, (b) describes each activity or service that each individual performed and (c) states the number of hours (in increments of one-tenth of an hour) spent by each individual providing the services. Each numbered tab in Exhibit A corresponds to the matter number that WKMB assigned to each Subject Matter. If a Subject Matter does not appear, then WKMB did not bill time or expenses for that Subject Matter during this Fee Period, but may bill time for that Subject Matter in the future.

**Reasonable and Necessary Services Rendered by WKMB**

**Categorized by Matter**

14. The professional services that WKMB rendered during the Fee Period are grouped into the numbered and titled categories of subject matters described in Paragraphs 15-19 herein (the "Subject Matter(s)").

15. Matter 6 – Honeywell litigation

(Fees: \$128,187.50 less \$51,275.00=\$75,912.50, Hours: 523.70)

This Subject Matter involves time spent in litigation against Honeywell International, Inc. to recover substantial costs and damages and to compel Honeywell to clean up nearly a million tons of chromium process waste disposed of by a Honeywell predecessor, Mutual Chemical Company. Included is time preparing and filing motions, working on fact and expert discovery, undertaking factual and legal research and analysis and attending court hearings.

16. Matter 9 – Libby, Montana

(Fees: \$3,696.00; Hours: 8.40)

This Subject Matter describes activities concerning the representation of the Debtors before the U.S. Environmental Protection Agency relating to EPA's enforcement action concerning asbestos at Libby, Montana. Included is time for meetings with EPA and strategic planning.

17. Matter 10 - Fee Application

(Fees: \$1,232.00; Hours:2.80)

This Subject Matter is for time spent for the preparation of the fee applications for October and November 2001.

18. Matter 11 - General Matters

(Fees: \$3,106.00; Hours: 9.0)

This Subject Matter is for time spent preparing the annual audit letter for the W. R. Grace certified public accountants and other general bankruptcy matters.

Actual and Necessary Expenses

19. It is WKMB's policy to charge its clients in all areas of practice for identifiable non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. It is WKMB's policy to charge its clients only the amount actually incurred by WKMB in connection with such items. Examples of such expenses are postage, overnight mail, courier delivery, transportation, overtime expenses, computer assisted legal research, photocopying, out-going facsimile transmissions, airfare, meals, and lodging. With respect to airfare expenses, all travel, by all individuals, is billed at the coach class rate with allowances for class upgrades.

20. WKMB charges: (a) \$0.15 per page for duplication and (b) \$0.75 per page for outgoing telecopier transmissions (plus related toll charges). WKMB does not charge its clients for

incoming telecopier transmissions. WKMB has negotiated a discounted rate for Lexis and Westlaw computer assisted legal research, which is approximately \$125/hour of online use of the standard Westlaw databases and approximately \$3.00/minute for Lexis databases. Computer assisted legal research is used whenever the researcher determines that using Lexis/Westlaw is more cost effective than using traditional (non-computer-based legal research) techniques.

21. A summary of expenses by type, as well as a detailed itemization and description of the disbursements made by WKMB on the Debtors' behalf during the Fee Period is attached hereto as Exhibit B. All of these disbursements comprise the requested sum for WKMB out-of-pocket expenses, totaling \$3,160.68. These disbursements are grouped in Exhibit B into the same numbered and titled categories of Subject Matters as the fees are grouped in Exhibit A. The numbered tabs within Exhibit B correspond to the numbers assigned to the matters described in Paragraphs 15-19 herein. Any missing Subject Matters merely indicate that no expenses were attributed to such Subject Matters during the Fee Period, although expenses may be attributable to such Subject Matters in the future. A summary of expenses by category for the entire Fee Period is also set forth in Exhibit B.

### **Representations**

22. WKMB believes that the Application is in compliance with the requirements of Del.Bankr.LR 2016-2.

20. Although every effort has been made to include all fees and expenses from the Fee Period in the Application, some fees and expenses from the Fee Period might not be included in the Application due to accounting and processing delays. WKMB reserves the right to make further application to the Court for allowance of fees and expenses for the Fee Period not included herein.

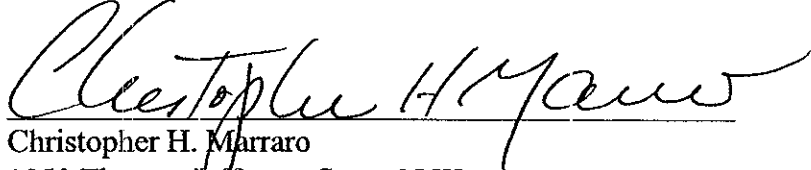
21. In summary, by the Application, WKMB requests compensation for fees and expenses in the total amount of \$139,382.18 consisting of (a) \$136,221.50 for reasonable and necessary professional services rendered and (b) \$3,160.68 for actual and necessary costs and expenses.

WHEREFORE, WKMB respectfully requests (a) that an allowance be made to it, as fully described above for the (i) 80% of the reasonable and necessary professional services WKMB has rendered to the Debtors during the Fee Period (\$67,957.20 after a discount credit for the Honeywell Matter 6 of \$51,275.00) and (ii) 100% of the reimbursement of actual and necessary costs and expenses incurred by WKMB during the Fee Period (\$3,160.68); (b) that both fees and expenses are payable as administrative expenses of the Debtors' estates; and (c) that this Court grant such further relief as is equitable and just.

Washington, D.C.  
Dated: March 25, 2002

Respectfully submitted,

WALLACE KING MARRARO & BRANSON PLLC



Christopher H. Marraro  
1050 Thomas Jefferson Street N.W.  
Washington, D.C. 20007  
(202) 204-1000

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JJF)  
) (Jointly Administered)  
)  
Debtors. )

**VERIFICATION**

Christopher H. Marraro, after being duly sworn according to law, deposes and says:

1. I am a partner with the applicant firm, Wallace King Marraro & Branson, PLLC and I am a member in good standing of the bars of the State of New Jersey and District of Columbia.

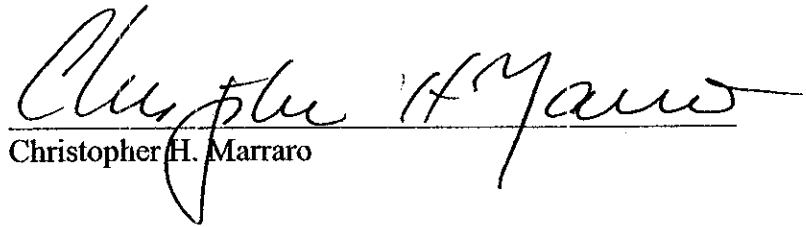
2. I have personally performed certain of, and overseen the legal services rendered by Wallace King Marraro & Branson PLLC as special litigation and environmental counsel

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Hornco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc.), E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

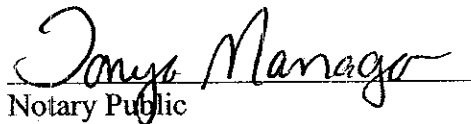
to the Debtors and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and other persons in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information and belief.

  
Christopher H. Marraro

In the District of Columbia

SWORN TO AND SUBSCRIBED  
before me this 25th day of March 2002.

  
Notary Public

My Commission Expires: **Tonya Manago**  
Notary Public, District of Columbia  
My Commission Expires 03-14-05



## **EXHIBIT A**

**MATTER 6 - HONEYWELL**  
**FEES - FEBRUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

March 25, 2002

W. R. Grace & Co.  
Attention: Richard Senftleben  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12701

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Professional Services:

		<u>Hours</u>
02/01/02	CHM Work on trial preparation: stipulations and legal issues.	4.50
	WH Conferences with Ms. Flax re documenting Grace's response costs and review/collect exhibits in support of same (4.6 hrs.); review site photos and documents re groundwater contamination and confer with expert re same (1.4 hrs.); revise database of trial exhibits and confer with Ms. Banks re same (2.8 hrs.).	8.80
	BB Quality check new entries to draft trial exhibits list against exhibits (2.3 hrs.); review and cross reference new designated trial exhibits against draft trial exhibits list and prepare for incorporation on list (3.1 hrs.)	5.40
02/02/02	MM Continue to search case databases (i.e., printouts) re producing all damage related documents requested by Ms. Flax (3.2 hrs.); continue to review various depositions of James Wong and prepare brief summaries of same (2.3 hrs.).	5.50

W. R. Grace &amp; Co.

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		<u>Hours</u>
02/04/02 TP	Reviewed cases (4.0 hrs.); drafted detailed summary of research on issue of withholding cost documents based on privilege and emailed to Mr. Hughes (3.7 hrs.).	7.70
CHM	Conference with Lowenstein (.2 hrs.) re-draft stipulation for stay (.8 hrs.); conference with client (.4 hrs.).	1.40
BB	Consult with Mr. Hughes re additional designated trial exhibits (.1 hrs.); consult with Mr. Hughes re documents received from Honeywell expert Peter Deming (.2 hrs.); research case files, PLAXIS CD documents, and set of documents relied upon by Mr. Deming for his expert report and cross reference against draft trial exhibits list and provide results to Mr. Hughes (1.3 hrs.); cross reference additional designated trial exhibits against draft trial exhibits list (1.7 hrs.); prepare new designated trial exhibits for incorporation into exhibits list (2.3 hrs.) proof and quality check new entries (1.3 hrs.).	6.90
WH	Conferences with Mr. Marraro and Ms. Flax re documenting Grace's damages claims (.4 hrs.); collect documents to be used in support of same (2.4 hrs.); review documents re UST remediation and select trial exhibits re same (4.7 hrs.); revise database of trial exhibits (.8 hrs.); conference with Ms. Banks re FOIA request issue (.3 hrs.).	8.60
MM	Continue to search case databases re producing all damage related documents requested by Ms. Flax (2.4 hrs.); continue to review various depositions of James Wong and prepare brief summaries of same (1.4 hrs.).	3.80
02/05/02 WH	Conference with Mr. Marraro re new NJDEP wastewater discharge regulation and potential applicability to case (.4 hrs.); legal research re new NPDES rule (2.3 hrs.); conferences with Ms. Banks and expert re billing issues (.6 hrs.); review and collect documents re geotechnical	8.40

W. R. Grace &amp; Co.

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Hours

issues for use at trial (2.8 hrs.); conference with Dr. Valera re Deming exhibits (.5 hrs.); conference with groundwater expert re collection of trial exhibits (.5 hrs.); review stipulation from Honeywell's counsel re expert discovery issue and coordinate filing of same with court (.8 hrs.); conferences with Ms. Parker and Mr. Senfleben re reimbursement by Honeywell of Grace's expert deposition costs (.5 hrs.).

02/05/02 TP	Drafting summary of cases related to NCP compliance and New Jersey Spill Act and organizing same according to jurisdiction and chronologically.	7.80
MM	Continue to search case databases re producing all damage related documents requested by Ms. Flax (3.6 hrs.); finalize various depositions of James Wong (i.e., 4/19/01; 5/23/01; and 5/30/01) and prepare brief summaries of same (4.1 hrs.); follow-up telephone conferences with Attorney Besson at Paul Hastings' office re obtaining copies of Dr. Delaney's expert report and deposition transcript (.3 hrs.); case management (.4 hrs.).	8.40
RLS	Review electronic message from Ms. Banks regarding review of Parsons Engineering documents (.1 hrs.); search case file room for relevant documents (.1 hrs.); review Parsons documents per Mr. Hughes request for reports and memos regarding heaving and chromium contamination (3.3 hrs.).	3.50
BB	Scan and email pertinent Mueser Rutledge document in preparation for trial to Mr. Hughes (.3 hrs.); consult with Mr. Hughes re assignment (.1 hrs.); collect and prepare pertinent correspondence from file for Mr. Marraro (.2 hrs.); consult with Ms. Kelly re additional designated trial exhibits (.2 hrs.); continue analysis of case file documents in re chronology of Grace Retail Corporation and	3.10

W. R. Grace &amp; Co.

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		<u>Hours</u>
	Channel Home Centers merger in preparation for trial for Mr. Hughes (2.4 hrs.)	
02/06/02 WH	Review and collect documents to be used as trial exhibits re soil, groundwater and sediment contamination issues (4.2 hrs.); revise database re trial exhibits (1.6 hrs.); legal research re privilege issue (1.0 hrs.).	6.80
BB	Review and cross reference records on expert invoices and place calls to experts to confirm payment status for Mr. Hughes (2.9 hrs.); create updated table of same (.7 hrs.); provide guidance to Mr. Moasser re case index inquires re resolution of damages issues (.1 hrs.); research production and additional case files for documents relevant to 1986 merger (.8 hrs.); collect from case files and print from CD (.8 hrs.); analyze and incorporate collected documents into descriptive 1986 chronology table (4.5 hrs.).	9.80
MM	Draft memorandum to Mr. Hughes with copies of various James Wong deposition summaries (.2 hrs.); office conference with Mr. Hughes re same (.2 hrs.); continue to search case databases re producing all damage related documents requested by Ms. Flax (4.2 hrs.); telephone conferences with Mr. Besson's assistance re producing copies of Dr. Delaney's expert report and deposition (.2 hrs.); case management (.3 hrs.).	5.10
RLS	Draft memorandum to Ms. Hughes regarding review of Parsons documents (.3 hrs.); organize Parsons documents into a folder for Mr. Hughes review (.2 hrs.); organize and incorporate files into the case file (.2 hrs.); compose and review return email from Mr. Hughes regarding Black & Veatch documents (.3 hrs.); review B & V documents for pertinent reports, memos and other documentation (2.7 hrs.).	3.70

W. R. Grace &amp; Co.

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		<u>Hours</u>
02/07/02 TP	Continued reviewing and drafting summary of cases related to NCP compliance and New Jersey Spill Act and organizing same according to jurisdiction and chronologically.	7.10
CHM	Interview potential witnesses.	3.20
WH	Review water results and confer with expert re same (1.1 hrs.); review and select experts' documents for designation as trial exhibits (5.6 hrs.); revise database re trial exhibits/materials (1.1 hrs.).	8.80
MM	Review and prepare brief summaries of James Wong's 5/31/01 deposition and Peter D. Blanchard's 7/26/01 deposition (3.1 hrs.); draft memorandum to file and Mr. Hughes with copies of stated summaries for his review (.2 hrs.); incorporate stated memorandums into files (.1 hrs.); follow-up telephone conference with Mr. Besson's assistant, April, re obtaining Dr. Delaney's expert report and deposition (.2 hrs.); case management (.4 hrs.).	4.00
AP	Review correspondence and revise brief.	0.60
BB	Proof 1986 descriptive chronology and note issues and missing documents (1.4 hrs.); Research production database, previous site chronologies and case files for documents to resolve issues and transaction gaps re 1986 inter-corporate site transfer (3.3 hrs.); incorporate same into descriptive chronology table and binder (3.5 hrs.); Respond to telephone inquiry from Dr. Valera re deposition invoice and prepare fax re same (.4 hrs.)	8.60
02/08/02 AP	Review, revise in limine brief (2.1 hrs.); review exhibit documents (1.0 hrs.); designate deposition testimony (1.0 hrs.).	4.10
TP	Updated list of cases reviewed to date on NCP and New Jersey Spill Act noting whether they have been shepardized for additional cases or	8.30

W. R. Grace &amp; Co.

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		<u>Hours</u>
	key cited for authority (.4 hrs.); searched for cases on NCP compliance and New Jersey Spill Act and downloaded additional cases (7.7 hrs.); reviewed recent correspondence (.2 hrs.).	
02/08/02 BB	Continue analyzing, preparing and resolving issues re chronology of inter-corporate transfers for Mr. Hughes (5.1 hrs.); make telephone calls to U.S. Postal Service and local counsel re letter sent by Express Mail to Carella Byrne (1.4 hrs.); provide status and consult with Hughes re same (.3 hrs.); consult with Mr. Hughes, Ms. Kelly, Mr. Kaider, and Ms. Manago re alternative electronic program for trial exhibit list (.7 hrs.); consult with Hughes re Aldredge deposition in Abeille-Paix case (.2 hrs.); consult with Ms. Kelly and resolve issues re draft trial list (.8 hrs.); review and cross-reference chromium sampling results documents for trial exhibit review for Mr. Hughes (.5hrs.).	9.00
CHM	Work with experts on exhibits for pre-trial.	5.40
WH	Legal research re site remediation and groundwater issues (1.8 hrs.); review new case correspondence (.4 hrs.); conferences with Ms. Banks re preparing trial prep materials (.8 hrs.); work on database re trial/cross-examination materials (3.8 hrs.); work on trial brief (1.2 hrs.).	7.80
KK	Convert table of exhibits in Word to summation database.	3.00
NAB	Scan case documents (2.4 hrs.); incorporate same into electronic files (1.1 hrs.); create hyperlinks for same on the appropriate case indices (2.2 hrs.).	7.50
02/09/02 TP	Read and summarized additional cases related to NCP compliance and New Jersey Spill Act.	2.90



W. R. Grace &amp; Co.

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		<u>Hours</u>
02/09/02 BB	Continue organizing and analyzing case documents, and compile chronology of 1986 inter-corporate transfer of site property for Mr. Hughes.	3.50
02/11/02 BB	Complete preparation of 1986 inter-corporate transfer records and memoranda and create and quality table of chronology and binder of documents in preparation for pre-trial conference for Mr. Hughes.	7.80
TP	Shepardized all remaining cases reviewed to date to ensure no negative history impacting issues of NCP compliance and NJSA and to identify other cases on these issues, reviewed shepards results and downloaded additional relevant cases (8.1 hrs.); reviewed pleading index and sent emails to Mr. Hughes and Mrs. Banks re whether motion to exclude expert testimony on NCP had been filed and provided case to Mr. Hughes on this issue that were found during research on NCP compliance issues (.6 hrs.).	8.70
WH	Confer with consultant re site sampling issue (.4 hrs.); collect and review relevant DEP correspondence and directives re swale discharge and upgrade issues (2.3 hrs.); designate documents and deposition transcripts for use at trial (5.8 hrs.).	8.50
02/12/02 AP	Research relating to CERCLA allocation.	4.40
WH	Collect and review relevant reports and DEP correspondence re Allied's IRM for use as trial exhibits (3.6 hrs.); designate documents and deposition transcripts for use as trial exhibits on issue of knowledge of chromium health risks (3.6 hrs.); work on cross-examination outline and supporting documents (2.1 hrs.).	9.30
NAB	Review and analyze case documents (1.1 hrs.); index and integrate same into case files (4.1 hrs.); create hyperlinks for documents not	7.50

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Hours

	already "Linked" on correspondence indices (2.3 hrs.).	
02/12/02 TP	Printed out and began review of cases located via shepardizing (.9 hrs.); provided additional cases on expert testimony on NCP compliance to Mr. Hughes and issue of privilege for cost documents (.5 hrs.); searched case law for provisions in 1985 version of NCP, copied out quotes and began drafting chart comparing the 1985 version to the 1990 version (5.4 hrs.).	6.80
BB	Analyze case documents and prepare indexed, descriptive chronology of 1981 site transaction in preparation for trial for Mr. Hughes (4.9 hrs.); place follow-up telephone call to local counsel re Deming Stipulation and send email message re filing of same for Mr. Hughes (.4 hrs.); report results to Mr. Hughes (.1 hrs.); resolve issues re exhibits list (1.2 hrs.); cross reference newly designated docs against trial list, prepare additional exhibits and incorporate into exhibits list (3.4 hrs.)	10.00
MM	Finalize cite checking and pulling of all cases from Westlaw re brief in support of in limine motion (3.9 hrs.); forward all cited cases and revised brief to Ms. Pelletier for review (.2 hrs.); office conference with Ms. Pelletier re same (.2 hrs.); review recent correspondence distributed by Ms. Campbell (.3 hrs.); continue to search case databases and case material for documents relating to damage issues as requested by Ms. Flax (1.7 hrs.); case management (.3 hrs.).	6.60
02/13/02 WH	Revise list of stipulations, legal issues and trial exhibits for review by Messrs. Agnello and Marraro (7.7 hrs.); conference with Mr. Goad re swale issue (.3 hrs.); legal research re evidentiary issue (.7 hrs.).	8.70
CHM	Work on pre-trial order issues (3.2 hrs.); conference call with CETH re various issues (.8 hrs.); conference with plaintiffs re second	5.00

W. R. Grace &amp; Co.

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Hours

amended complaint (.5 hrs.); conference with client (.5 hrs.).

02/13/02 TP	Westlaw key number search in Third Circuit for health and environmental cases to determine if all relevant cases have been located (.4 hrs.); reviewed CFR and extracted relevant portions of 1990 NCP, updated chart with noting corresponding section numbers for 1985/1990 versions, which provisions were added in 1990 version, and summarized steps for removal and remedial under each version (4.7 hrs.); began organizing printed cases based on jurisdiction and putting case summaries in memo in order by jurisdiction and reverse chronology; eliminated unnecessary cases from summary where more recent and/or higher court stated same proposition (1.3 hrs.).	6.40
RLS	Review and quality check chronology of Grace's acquisition of Daylin, Inc.(2.4 hrs.); review and quality check Chronology of 1981 Route 440 transfer and transactions(1.4 hrs.); review and quality check chronology of 1986 inter-corporate transfer Grace Retail/Channel Homes/ECARG(1.3 hrs.).	5.10
BB	Cross reference and verify newly designated trial exhibits from the production files of Mueser Rutledge, Parsons, knowledge issue documents collected by Ms. Shellnut, Daylin acquisition and north swale documents against draft trial exhibits list and note issues to be addressed for Mr. Hughes (7.0 hrs.); provide guidance to Mr. Moasser re resolution of damages issues (.2 hrs.)	7.20
MM	Continue to search case databases and case material for documents relating to damage issues as requested by Ms. Flax (2.8 hrs.); office conferences with Mr. Marraro and Ms. Banks re status of damage related issues and need to follow-up with client for several documents (.4 hrs.); telephone conference with Ms. Flax re same (.2 hrs.); review recent	5.40

W. R. Grace &amp; Co.

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		<u>Hours</u>
	correspondence distributed by Ms. Campbell (.2 hrs.); follow-up office conference with Ms. Banks re assisting with locating various persons' documents from our databases to be added to exhibit list (1.4 hrs.); case management (.4 hrs.).	
02/14/02 WH	Conferences with Messrs. Agnello and Marraro re pretrial order (.8 hrs.); prepare definitions of key terms for inclusion in pretrial order and confer with Ms. Flax re same (1.2 hrs.); work on trial brief (.5 hrs.); review new documents produced by Honeywell re site inspection and confer with Mr. Goad re same (1.3 hrs.); work on stipulations re contamination issues at site (1.4); conference with counsel for ICO re RCRA claim (.3 hrs.); collect and analyze admissions by Honeywell re Mutual successor issue (1.6 hrs.); work on pretrial order issues (2.1 hrs.); revise database re trial exhibits (.5 hrs.).	8.30
CHM	All-day meeting with Carella Byrne re trial preparation.	8.50
TP	Continued editing of summary memo to eliminate unnecessary cases, condensing summaries, checking pin point cites pages, checking.	4.60
MM	Continue to search Parson's document production re attempting to locate actual bates stamped documents to be used as trial exhibits (1.9 hrs.); office conference with Ms. Banks re status of same (.2 hrs.); review recent correspondence distributed by Ms. Campbell (.4 hrs.); case management (.2 hrs.).	2.70
BB	Read, analyze, organize and incorporate new correspondence and case documents into indexed case files and create new files (7.9 hrs.); research pleadings and discovery binders and collect pertinent admissions for Mr. Hughes (.6 hrs.)	8.50

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		<u>Hours</u>
02/15/02	TM Consult with Ms. Banks and Mr. Moasser re request from local counsel regarding the answer to Honeywell's amended complaint (1.5 hrs.).	1.50
	CHM Meeting with expert in New York.	3.00
	MM Telephone conference with Ms. Flax re searching case material and producing various documents for her review (.2 hrs.); search case material (i.e., hard copies and all databases) re stated documents requested by Ms. Flax (1.7 hrs.); office conference with Ms. Manago and Ms. Bynum re same (.3 hrs.); review recent case correspondence distributed by Ms. Campbell (.3 hrs.); continue to search case material re requested damage documents requested by Ms. Flax to be used as trial exhibits (1.3 hrs.); case management (.3 hrs.).	4.10
	BB Consult with Ms. Manago re request from local counsel (.2 hrs.); research case files and related Riverkeeper case file for pertinent document for Ms. Flax (.5 hrs.); scan pertinent document (.3 hrs.); prepare email message and forward scanned document to local counsel (.4 hrs.); continue entry of deposition designations for Daniel Swallick in preparation for pre-trial conference (.6 hrs.).	2.00
02/17/02	CHM Prepare for meeting with land planner.	1.20
02/18/02	MM Continue to search case material/databases for damage related documents.	2.80
	TP Edited summary memo and chart of 1985 v. 1990 NCP, arranged cases in order for placement in proper section in binders.	5.60
	BB Review, organize, prepare and incorporate new correspondence into indexed case files (1.8 hrs.); create new files for Honeywell supplemental production of site inspection reports (.9 hrs.); continue preparation of list of	3.70

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		<u>Hours</u>
	deposition designation for pre-trial conference for Ms. Pelletier (.7 hrs.).	
02/18/02 CHM	Attend at meeting with land planners (4.0 hrs.); various meetings with A. Nagy and others (4.0 hrs.).	8.00
02/19/02 CHM	Review analytical results and conference with consultant re same (.6 hrs.); conference with client (.5 hrs.); review NCP issues (.7 hrs.).	1.80
WH	Conferences with Mr. Marraro and Ms. Banks re Allied's remediation of the Baltimore Works Site (1.4 hrs.); collect and analyze Allied's RI/FS documents re Baltimore Work Site and prepare file memo re same (6.7 hrs.); confer with Ms. VonMiddlesworth re collecting trial exhibits on environmental issues (.3 hrs.); review draft list from Geomega (.3 hrs.).	8.70
BB	Return call to Mr. Senfleben in response to inquiry re SI Group invoice for Mr. Hughes (.1 hrs.); continue review of new correspondence and court filings, prepare and incorporate into indexed case files and create new files (6.1 hrs.); respond to return telephone call from Mr. Senfleben and report results to Mr. Hughes (.1 hrs.).	6.20
MM	Follow-up telephone conferences with April, assistant to Mr. Besson at Paul Hasting's office re status of obtaining copies of Dr. Delaney's expert report and deposition transcript (i.e., Lockheed v. Crane) (.2 hrs.); forward e-mail to Ms. Pelletier re status of same (.1 hrs.); office conference with Ms. Pelletier re same as well as other miscellaneous case matters (.2 hrs.); case management (.4 hrs.).	0.90
TP	Phone conference and email with Mr. Hughes outlining research performed on NCP and NJSA claims, made edits to memo and checked hard copy cases in binder to ensure proper organization to accompany memo, and	7.90

W. R. Grace &amp; Co.

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		<u>Hours</u>
	emailed memo and chart to Mr. Hughes and gave binders with case law to him.	
02/20/02 WH	Conference with Mr. Marraro on issues relating to sites neighboring Route 440 Site (.3 hrs.); conferences with Ms. Banks re obtaining RI Reports and other materials re neighboring sites (.8 hrs.); collect and analyze materials re sites 73, 124, 125, 134, 140 and 163 and confer with non-testifying expert re contamination issues at same (6.8 hrs.).	7.90
TP	Organized hard copy and electronic files of materials used in NCP and NJSA research as well as the cases not included, transferred appropriate electronic files to network for use by others on team (1.2 hrs.); made edits to 1985 v. 1990 NCP chart and emailed corrected version to Mr. Hughes (.4 hrs.); reviewed recent case correspondence (.1 hrs.).	1.60
BB	Consult with Mr. Hughes re communications from the Brattle Group (.1 hrs.); continue to incorporate new documents into case files and create new files (2.2 hrs.); incorporate new pleadings into case and electronic files (5 hrs.); consult with Mr. Hughes to resolve issues re documents and third-party subpoenaed documents considered for trial exhibits (.2 hrs.); consult with Ms. Pelletier re assignment in preparation for trial (.2 hrs.); review office records re resolution of status of two outstanding invoices for the Brattle Group for Mr. Hughes (.2 hrs.); collect and email pertinent electronic documents to Mr. Hughes (.1 hrs.); research MDE and U.S. EPA Superfund Archive NPL Internet sites for information on Allied Chemical Corp. Baltimore Works site, download, locate map of site, prepare documents and send email memo of research results to Mr. Hughes (3.8 hrs.).	7.20

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		<u>Hours</u>
02/20/02 AP	Review documents relating to Tetra Tech work at site; conference with B. Hughes and B. Banks re same.	2.50
02/21/02 WH	Conferences with Ms. Banks re website searches and submitting FOIA requests to NJDEP re neighboring sites (.8 hrs.); analyze additional documents re PRPs and soil and groundwater contamination at sites 73, 124, 125, 134, 140 and 163 (7.7 hrs.); review new case correspondence and confer with Ms. Banks re same (.3 hrs.).	8.80
CHM	Review B. Hughes' memo on Baltimore issues (.3 hrs.); conference with client re same (.3 hrs.).	0.60
MM	Follow-up with Mr. Besson at Paul Hasting's office re status of obtaining Dr. Delaney's expert report and deposition (i.e., Lockheed v. Crane) (.1 hrs.); office conference with Ms. Pelletier and Mr. Hughes re miscellaneous pretrial matters (.3 hrs.); case management (.4 hrs.).	0.80
BB	Prepare memo of results of research of Allied Baltimore Works site for Mr. Hughes (.8 hrs.); collect and prepare Baltimore Works documents (4.3 hrs.); consult with Mr. Hughes re same (.1 hrs.); read, analyze and organize documents re Tetra Tech's work at site for Honeywell (1.3 hrs.); prepare list and draft memo of research results of same for Ms. Pelletier (1.8 hrs.).	8.30
02/22/02 CHM	Work on damages issues (1.5 hrs.); conference with client re JC meetings (.5 hrs.).	2.00
AP	Conference with B. Banks regarding trial exhibits and new Honeywell production; review new documents produced by Honeywell.	1.20



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		<u>Hours</u>
02/22/02 MM	Case management (.3 hrs.).	0.30
BB	Read and analyze production documents received from Tetra Tech and create descriptive chronological table (2.3 hrs.); collect all relevant documentation regarding site work performed or coordinated by Tetra Tech (3.8 hrs.); finalize memo of all site work performed by Tetra Tech for Ms. Pelletier (2.5 hrs.); consult with Mr. Hughes re assignment regarding unidentified Jersey City Chromate site (.3 hrs).	8.90
WH	Conference with Dr. Schmiermund re collecting heaving-related trial exhibits (.6 hrs.); confer with non-testifying expert re sampling issue (.4 hrs.); revise list of draft stipulations and legal issues for pretrial order (3.8 hrs.); review additional deposition transcripts from Allied's coverage case re designations for trial (3.7 hrs.); conference with Dr. Schmiermund re collecting heaving-related trial exhibits (.6 hrs.); confer with non-testifying expert re sampling issue (.3 hrs.).	9.40
02/25/02 WH	Review Davis and Walerko deposition transcripts and RI Report re impact of chromium contamination at Home Depot site on Route 440 site (1.8 hrs.); prepare file memo and message to Ms. Flax re Home Depot issue (.4 hrs.); analyze Black & Veatch and Parsons environmental reports for possible designation a trial exhibits (3.6 hrs.); update database entries re trial exhibits (.8 hrs.); work on cross-examination materials for experts (.7 hrs.); prepare memo to Mr. Marraro re adjacent sites (.9 hrs.); conferences with Ms. Banks re exhibits (.5 hrs.).	8.70
BB	Research production database and CDs for documents re Jersey City Chromium Sites 73, 134, 124, 125, 140 and 163 and create tables of relevant documents for each site for Mr. Hughes (5.3 hrs.); consult with Mr. Hughes re	8.10

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Hours

same (.2 hrs.); research Internet and NJDEP web sites for information to identify and obtain status of chromium contaminated site located north of Society Hill development for Mr. Hughes (1.4 hrs.); prepare email memo re same and collect and prepare supporting documents (1.0 hrs.); collect relevant RI reports for Mr. Hughes (.2 hrs).

02/25/02 TP	Reviewed recent case correspondence.	0.10
02/26/02 WH	Prepare proposed stipulations of fact re Honeywell's RI and IRM activities (4.7 hrs.); review deposition transcript re designations for trial (3.4 hrs.).	8.10
BB	Prepare email memo re research analysis on unidentified Jersey City chromium site with relevant documentation (.4 hrs.); consult with Mr. Hughes re site analysis and research results (.3 hrs.); collect and prepare documents re Roosevelt Lanes Jersey City chromium site for Mr. Hughes (1.1 hrs.); research NJDEP SRP and related web sites and U.S. EPA chrome sites re Droyers Point for Mr. Hughes (3.7 hrs.); prepare email of research results for Mr. Hughes (.4 hrs.); collect documents re Old Dominion Jersey City chromium site and refine table of identified relevant documents (2.1 hrs.).	8.00
02/27/02 WH	Review memo from Ms. Parker and supporting materials re NCP challenge to Honeywell's response costs (2.3 hrs.); legal research re cost recovery issues under the NJ Spill Act and prepare memo re same (2.8 hrs.); review and analyze documents re Grace corporate reorganization issues for use as trial exhibits (2.6 hrs.); conferences with Ms. Banks re document management issues (.5 hrs.).	8.20
MM	Follow-up with Mr. Besson's office re status of obtaining expert report and deposition transcript of Dr. Delaney (.2 hrs.); review	1.60

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			<u>Hours</u>
		recent correspondence distributed by Ms. Campbell (.3 hrs.); case management (1.1 hrs.).	
02/27/02	CHM	Work on pre-trial order (stipulations of facts).	2.50
	BB	Analyze results of additional research for information re contaminants, source of contamination, remediation status, site ownership, and boundaries for Jersey City Chromium site 119 (Droyers Point JCRA and Droyers Point Northern Parcel) (1.9 hrs.); prepare email memo re research results for Mr. Hughes (1.3 hrs.); prepare packet of exhibits and cover letter to plaintiff for Mr. Hughes (.4 hrs.).	3.60
	NAB	Collect documents re Delphic Site and refine table of identified relevant documents	7.50
02/28/02	NAB	Collect documents re Delphic & Degan Sites and refine table of identified relevant documents	7.50
	WH	Collect trial exhibits and work on database of trial exhibits and cross-examination materials (6.2 hrs.).	6.20
	CHM	Work on pre-trial exhibits.	2.50
	BB	Consult with Ms. Kelly re resolution of issues with editing draft trial exhibits list in Summation and Word (.4 hrs.); consult with Mr. Hughes re results of Droyers Point research and status and preparation of trial exhibits list (.3 hrs.); draft public records request to NJDEP re Hudson County Chromium Site 119 for Mr. Hughes (.5 hrs.).	1.20
			<u>Amount</u>
Total Fees			523.70 \$128,187.50
02/28/2002 Less Deduction of 40% Per Agreement			(\$51,275.00)

W. R. Grace &amp; Co.

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Amount

Balance Due

\$76,912.50

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	137.00	135.00
Natasha A. Bynum, Legal Clerk	30.00	100.00
William Hughes, Counsel	150.00	350.00
Keith Kaider, Paralegal	3.00	135.00
Tonya Manago, Sr. Paralegal	1.50	135.00
Christopher H. Marraro, Partner	49.60	440.00
Mahmoude Moasser, Paralegal	52.00	135.00
Tamara Parker, Associate	75.50	270.00
Angela Pelletier, Associate	12.80	225.00
Reilly L. Smith, Paralegal	12.30	120.00

**MATTER 8 - LIBBY, MT.**

**FEES - FEBRUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007  
Phone 202.204.1000  
Fax 202.204.1001

March 25, 2002

W. R. Grace & Co.  
Attention: William Corcoran  
Vice President-Public & Regulatory Affairs  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12704

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

	<u>Hours</u>	
02/01/02 CHM Review articles from client.	0.50	
02/06/02 CHM Review documents from client (1.0 hrs.); meetings re Libby matter (2.5 hrs.).	3.50	
02/11/02 CHM Review documents from client.	0.60	
02/14/02 CHM Review articles from client.	0.50	
02/19/02 CHM Conference with EPA (.5 hrs.); review various articles from client (.5 hrs.).	1.00	
02/21/02 CHM Conference with W. Corcoran (.5 hrs.) and review memos sent to EPA (1.0 hrs.).	1.50	
02/25/02 CHM Review news articles from client.	0.80	
		<u>Amount</u>
Total Fees	8.40	\$3,696.00
Balance Due		<u>\$3,696.00</u>

W. R. Grace & Co.

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Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	8.40	440.00

**MATTER 10 - FEE APPLICATION.**

**FEES - FEBRUARY 2002**



Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

March 25, 2002

W. R. Grace & Co.  
Attention: Akos L. Nagy  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12702

For Professional Services Rendered in Connection with Preparation of Fee Application to  
Bankruptcy Court - Matter 10

Professional Services:

	<u>Hours</u>	
02/13/02 CHM Prepare fee application.	2.80	
		<u>Amount</u>
Total Fees	2.80	\$1,232.00
Balance Due		<u>\$1,232.00</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Christopher H. Marraro, Partner	2.80	440.00

**MATTER 11 - GENERAL MATTERS**

**FEES - FEBRUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

March 25, 2002

W. R. Grace & Co.  
Attention: Richard Senftleben  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12703

For Professional Services Rendered in Connection with General Matters - Matter 11

Professional Services:

			<u>Hours</u>
02/05/02	CHM	Prepare audit letter response.	6.20
02/19/02	BB	Bankruptcy -- Review, prepare and incorporate new correspondence into indexed case files (.5 hrs.); scan and incorporate same into electronic files (.4 hrs.).	0.90
	BB	Review, prepare, organize new correspondence and create indexed case file (.7 hrs.); scan and create weblinks to case index and incorporate into electronic case files (1.2 hrs.).	1.90
			<u>Amount</u>
Total Fees			9.00 \$3,106.00
Balance Due			<u>\$3,106.00</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Barbara Banks, Paralegal	2.80	135.00
Christopher H. Marraro, Partner	6.20	440.00

## **EXHIBIT B**

**EXPENSE SUMMARY**

Copies- Internal and Outside	\$1,331.50
Facsimile	\$17.25
Lexis	\$574.35
Telephone	\$66.73
Westlaw	\$874.90
Overtime Transportation	\$251.08
FedEx	\$20.00
Postage	\$24.87
Total	\$3,160.68

**MATTER 6 - HONEYWELL**  
**EXPENSES - FEBRUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000

Fax 202.204.1001

March 25, 2002

W. R. Grace & Co.  
Attention: Richard Senfleben  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12701

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Disbursements:

	<u>Amount</u>
Copy Costs - Internal	1,278.45
Facsimile Costs	17.25
FedEx Costs	8.75
Lexis Costs	574.35
Long Distance Charges	66.73
Outside Copies	51.10
Overtime Transportation	251.08
Postage	24.87
Westlaw	874.90
Total Disbursements	<u>\$3,147.48</u>

**MATTER 8 - LIBBY, MT.**  
**EXPENSES - FEBRUARY 2002**



Wallace  
King  
&  
Marraro  
Branson

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1050 THOMAS JEFFERSON STREET, N.W.  
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March 25, 2002

W. R. Grace & Co.  
Attention: William Corcoran  
Vice President-Public & Regulatory Affairs  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12704

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Disbursements:

	<u>Amount</u>
Copy Costs - Internal	1.95
Total Disbursements	<u>\$1.95</u>

**MATTER 11 - GENERAL MATTERS**  
**EXPENSES - FEBRUARY 2002**

Wallace  
King  
&  
Marraro  
Branson

WALLACE KING MARRARO & BRANSON, PLLC  
1050 THOMAS JEFFERSON STREET, N.W.  
WASHINGTON, DC 20007

Phone 202.204.1000  
Fax 202.204.1001

March 25, 2002

W. R. Grace & Co.  
Attention: Richard Senfleben  
7500 Grace Drive  
Columbia, MD 21044

Invoice #12703

For Professional Services Rendered in Connection with General Matters - Matter 11

Disbursements:

	<u>Amount</u>
FedEx Costs	11.25
Total Disbursements	<u>\$11.25</u>